

FILED

UNITED STATES DISTRICT COURT

JUL 08 2022

for the

Eastern District of North Carolina

PETER A. MOORE, JR., CLERK
U.S. DISTRICT COURT, EDNC
BY SEA DEP CLKUnited States of America
v.
PARKER ALLEN GIBSON

Case No.

5:22-mj-1651-JG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 22, 2022 in the county of Harnett in the
Eastern District of North Carolina, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 641

Theft of Government Property

26 U.S.C. § 5861(d)

Possession of Unregistered Firearm (Destructive Device)

This criminal complaint is based on these facts:

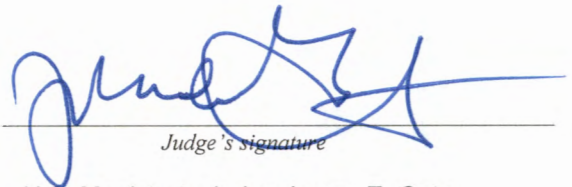
See attached

☒ Continued on the attached sheet.Pursuant to Rule 4.1 of the
Federal Rules of Criminal
Procedure, the affiant appeared
before me via reliable electronic
means, was placed under oath
and attested to the contents of
this affidavit.Richard B. Starnes

Complainant's signature

Richard B. Starnes, Task Force Agent, FBI

Printed name and title

Date: 7 July 2022City and state: Raleigh, NC

Judge's signature

U.S. Magistrate Judge James E. Gates

Printed name and title

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA

I, Richard B. Starnes, being first duly sworn, hereby depose and state that the following is true to the best of my information, knowledge, and belief:

INTRODUCTION AND AGENT BACKGROUND

1. I am a duly appointed Special Agent of the U.S. Army Criminal Investigation Division ("CID") and have been so employed since April 2015. I am currently assigned as a Task Force Agent ("TFA") with the Federal Bureau of Investigation ("FBI") Joint Terrorism Task Force with the Charlotte Division, Fayetteville Resident Agency. As a Special Agent of U.S. Army CID and TFA for the FBI, I am authorized to investigate crimes involving all violations of the Uniform Code of Military Justice, and other applicable federal and state laws where there is an Army interest. I am primarily assigned to investigate matters involving counter terrorism, including those laws relating to the federal violations below. I have conducted, as well as assisted other law enforcement officers, with physical surveillance, search warrants, and arrests of persons involved in a spectrum of federal violations. I have successfully completed the U.S. Army CID's Special Agent Course located at the U.S. Army Military Police School, Fort Leonard Wood, MO, a federally accredited criminal investigator training program. During my training at the Special Agent Course, I received legal instruction and advanced formal training on a variety of criminal investigations, including the use of the U.S. Army CID and FBI in furtherance of criminal activity such as identity theft, mail fraud, bank fraud,

extortion, child pornography and other related offenses. I have completed the Network Intrusion Basics Course, Introduction to Networks and Hardware, Computer Incident Response Course, and the Windows Forensic Examiner Course through the Defense Cyber Investigations Training Academy ("DCITA"). I have also completed the Digital Evidence Acquisition Specialist Program and the Vehicle Data Extraction Training Program, which are federally accredited training programs located at the U.S. Federal Law Enforcement Training Center. Additionally, I have completed CID Special Agent courses that include the Special Victims Training Program, the Criminal Intelligence Training Program, Hostage/Crisis Negotiator Level One Training Course, the U.S. Army Special Forces Technical Exploitation Course, and the BATF Level One Post-Blast Investigation Course, FBI WMD Investigations and Operations Course, FBI WMD Joint Intermediate Biological and Chemical Threats Course, and the FBI WMD Intermediate Radiological and Nuclear Threats Course. Prior to my position with the FBI, I was employed as a Special Agent with U.S. Army CID as a cyber investigator. Additionally, and prior to working for U.S. Army CID, I was employed as a Police Officer with the Charlotte-Mecklenburg Police Department for approximately thirteen years where I obtained my basic and advanced law enforcement certificates from the State of North Carolina. My duties as an officer included the investigation and enforcement of criminal laws in the State of North Carolina. Additionally, I served as a U.S. Army Reserve CID Special Agent from 2009 to 2019 where I retired from military service. My duties as a reserve U.S. Army CID Special Agent included investigating general crimes (to include but not

limited to murder, sexual assaults, various forms of fraud and related offenses) as well as conducting technical sensitive site exploitation in the war on terror. I hold an A.A.S. in Logistics from the Community College of the Air Force, a B.A. in Criminal Justice from UNC-Charlotte, a B.S. in Emergency Management from Western Carolina University, a M.S. in Security Studies from East Carolina University, a Master's Executive Certificate in Negotiations from the University of Notre Dame and currently pursuing a Doctorate of Strategic Leadership from Regent University.

2. This affidavit is submitted as evidence of probable cause supporting the arrest warrant for Parker Allen Gibson (herein after referred to as GIBSON), date of birth XX/XX/1979, social security number XXX-XX-6358, home address 68 Frenchie Lane, Bunnlevel, NC 28323, for violations of Title 18 U.S.C. § 641 – Theft of Government Property and Title 26 U.S.C. § 5861(d) – Possession of Unregistered Firearm (Destructive Device). This affidavit is intended to merely show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

3. GIBSON retired from the special operations community of the U.S. Army effective October 28, 2021. He retired with the rank of Master Sergeant.

4. A Confidential Source ("CS") reported in early May 2022 that the CS located military equipment in a storage unit. The storage unit was in CS's name but exclusively used by GIBSON.

5. As background, CS rented the storage unit located at Stockade Self Storage, Unit 204, in March 2021 at the request of GIBSON. GIBSON told CS his business partners, in a local drone photography business, were asking him for \$10,000 USD to contribute to the business taxes to which he felt he should not have to pay. GIBSON was concerned the business partners would lock him out of their storage unit and not allow him to retain his personal items within. CS rented the unit and provided GIBSON the keys. The CS then deployed with the CS's military unit for several months. CS returned to the storage unit in May 2022 to look through the storage unit since CS was concerned about GIBSON's behavior towards CS and felt GIBSON was hiding something from CS inside the storage unit. Upon arrival, CS found a new lock on the storage unit. CS removed the new lock with bolt cutters.

6. Upon further exploration of the storage unit, CS identified, what appeared to be: military drones (unmanned aerial vehicles), thousands of green-tipped 5.56 rifle rounds, military-issued lithium batteries, a military radio, and multiple cases of "swag" from GIBSON's previous military organization which included Yeti coffee mugs, wine glasses, whiskey glasses, glass decanters, flags, coins, and Christmas ornaments.

7. CS went to the residence CS shares with GIBSON located at 68 Frenchie Lane, Bunnlevel, NC 28323 (described above as the SUBJECT PREMISES) wherein CS searched the garage and located approximately 5,000 rounds of ammunition in a case tucked under some shelving.

8. CS notified an employee at GIBSON's former unit about the items CS found and, in turn, notified Army CID of the situation. On June 22, 2022, special agents from Army CID met with CS at the storage unit at which time a consent search was conducted of the storage unit. The consent search yielded an approximate total of 6,300 rounds of ammunition including 5.56, .380 blackout, .40 caliber, .38 caliber, and 9mm. Two incendiary grenades and one red smoke grenade were located. Also located in the storage unit were multiple drones. Classified material was also located in the search.

9. Army CID agents presented the grenades to a Master Sergeant and Chief Ammunition Non-Commissioned Officer ("NCO") at U.S. Army Special Operations Command, Fort Bragg North Carolina. The Chief Ammunition NCO confirmed the two incendiary grenades were live and operational, the Lot numbers associated the grenades to GIBSON's previous military unit, and the grenades were last accounted for at the unit in August 2020. Additionally, the Chief Ammunition NCO confirmed that Lot numbers on some of the above listed ammunition is associated with the U.S. Army Special Operations Command.

10. Army CID agents presented the drones to a civilian logistician for the Unmanned Aerial Systems Troop at GIBSON's previous military unit. The logistician confirmed two of the drones were U.S. Army specific Puma Drone Systems and via serial verification were determined to have been issued to the unit.

CONCLUSION

13. Based on the foregoing, I Richard B. Starnes, respectfully submit that there is probable cause to believe that Parker Allen Gibson is in fact guilty of knowingly and willfully stealing property belonging to the United States Government in violation of Title 18 U.S.C. § 641 and knowingly and willingly possessing a destructive device in violation of the Federal Firearms Act in violation of Title 26 U.S.C. § 5861(d)..

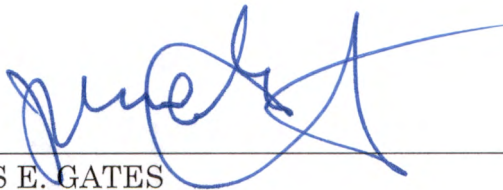
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Richard B. Starnes

Richard B. Starnes
Special Agent
TFA- Federal Bureau of Investigation

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this affidavit this 7 day of July, 2022.



JAMES E. GATES
UNITED STATES MAGISTRATE JUDGE